

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (JAG)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

**MOTION FOR ORDER COMPELLING DEFENDANT USPS TO ANSWER
INTERROGATORIES IN ACCORDANCE TO RULE 37(a) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. On March 24, 2004 Plaintiff notified Defendant USPS of a First Set of Interrogatories, and an informative motion was filed on April 5th, 2004 to notify this Honorable Court about said discovery (see docket number 180)
2. Defendant USPS had thirty (30) days to answer the interrogatories in accordance to Rule 33 (b)(3) of the Federal Rules of Civil Procedure.
3. Said thirty (30) days period elapsed and Defendant USPS has not answered the interrogatories, therefore an order is respectfully requested against defendant USPS to compel said party to answer the interrogatories.

WHEREFORE, it is respectfully requested from this Honorable Court to order defendant USPS to answer the interrogatories in accordance to Rule 37(a) of the Federal Rules of Civil Procedure.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on April 26, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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